

REED SMITH LLP

A limited liability partnership formed in the State of Delaware.

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23 UNITED STATES DISTRICT COURT

24 NORTHERN DISTRICT OF CALIFORNIA - SAN FRANCISCO DIVISION

25 EKANIRMA GANI,
26
27 Plaintiff,
28
vs.
ARROW FINANCIAL SERVICES,
L.L.C.
Defendant.

Case No. C 06-00301 MMC

**JOINT STIPULATION REQUESTING
CONTINUANCE OF INITIAL CASE
MANAGEMENT CONFERENCE AND ADR
DEADLINES AND [PROPOSED] ORDER
THEREON**

JOINT STIPULATION REQUESTING CONTINUANCE OF INITIAL CASE MANAGEMENT
CONFERENCE AND ADR DEADLINES AND [PROPOSED] ORDER THEREON

1 WHEREAS, the Court issued an Order Setting Initial Case
2 Management Conference and ADR Deadlines on January 17, 2006 (the
3 "Order");

4 WHEREAS, pursuant to the Order, March 31, 2006 is the last
5 day for the parties to meet and confer re: initial disclosures,
6 early settlement, ADR process selection, and discovery plan in
7 the above-referenced matter;

8 WHEREAS, pursuant to the Order, April 14, 2006 is the last
9 day for the parties to complete initial disclosures or state
10 objections in the Rule 26(f) Report, file a Case Management
11 Statement and file and serve a Rule 26(f) Report in the above-
12 referenced matter;

13 WHEREAS, pursuant to the Order, a Case Management Conference
14 in the above-referenced matter ^{is} ~~are~~ presently scheduled for ~~July~~
15 ~~April 21, 2006~~
16 ~~7, 2006 and July 17, 2006, respectively;~~

17 WHEREAS, the parties have reached an agreement in principle
18 to settle the above-referenced matter;

19 WHEREAS, the parties do not want to waste the Court's
20 judicial resources and the parties' time and money to fulfill
21 their obligations under the Order since the case has been settled
22 in principle and the parties believe that settlement will be
23 finalized within twenty-one days;

24 WHEREAS, this is the first time the parties have requested a
25 continuance of the dates in the Order;

26 IT IS HEREBY stipulated by and between Plaintiff Ekanirma
27 Gani and Defendant Arrow Financial Services, L.L.C. that the
28 Initial Case Management Conference and ADR deadlines contained in

1 the Order be continued for twenty-one days so as to allow the
2 parties to finalize their settlement of this matter.

3
4 DATED: March 30, 2006

LAW OFFICE OF WILLIAM E. KENNEDY

5
6 By /S/

7 Marco P. Quintana
8 Attorneys for Plaintiff
EKANIRMA GANI

9 DATED: March 30, 2006

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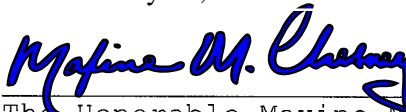
10
11 By /S/

12 Vanessa T. Lam
13 Attorneys for Defendant
14 ARROW FINANCIAL SERVICES,
L.L.C.

15 **[PROPOSED] ORDER**

16 IT IS SO ORDERED. The Initial Case Management Conference
17 and ADR deadlines contained in the Order Setting Initial Case
18 Management Conference and ADR Deadlines issued by the Court on
19 January 17, 2006 will be continued for twenty-one days. The initial
20 Case Management Conference is hereby continued to May 12, 2006 at 10:30 a.m.

21 Dated: March 30, 2006

22 

23 The Honorable Maxine M. Chesney
24 United States District Judge

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